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## Faculty Working Papers

### A MULTIOBJECTIVE MODEL FOR ELECTRIC UTILITY RATE REGULATION

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#719



College of Commerce and Business Administration

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Summary

The interests of the three parties to the regulatory process--the utility investors, the consumers, and the regulators--are often in conflict. Investors are concerned with shareholder wealth maximization while consumers desire dependable service at low rates. If the desired end product of regulation is to establish rates that balance the interests of consumers and investors, then a planning model is needed which accurately reflects the multiobjective nature of the regulatory decision process. This paper develops such a multiobjective programming model for examining the efficient trade-offs available to utility regulators in setting rates of return.

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## A MULTIOBJECTIVE MODEL FOR ELECTRIC UTILITY RATE REGULATION

Much of the electric utility regulatory process revolves around the presentation and rebuttal of expert testimony regarding "just and reasonable" rates of return that provide "a balancing of the investor and consumer interests" [2, 603]. More often than not the discrepancy between the rate of return a utility requests and what the regulatory commission staff and consumer intervenors recommend is substantial. Such conflicting views are to be expected because the interests of investors and consumers are often in conflict. Investors are concerned with shareholders wealth maximization while consumers desire dependable service at low rates. Because of the "natural monopoly" status of electric utilities, it is the job of regulatory commissions to resolve this inherent conflict between investors and customers by setting "fair and reasonable" rates.

If the desired end product of regulation is to establish rates that balance the interests of consumers and investors, then a planning model is needed which accurately reflects the multiobjective nature of the regulatory decision process. The purpose of this paper is to develop such a multiobjective programming model for examining the efficient trade-offs available to utility regulators in setting rates of return. The planning model will focus upon the objectives of the three parties to the regulatory process: the utility investors, the consumers, and the regulators. The model will incorporate inflation, anticipated growth rates in user demand, the resulting need for capital expenditures and financing, as well as targets specifying an "appropriate" capital structure,

and dividend policy. By simultaneously considering these factors in conjunction with the utility's need for revenues and customers' desire for low cost but dependable service, the programming model will identify the efficient, nondominated alternatives which "best satisfy" all parties to the regulatory process.

Following a brief overview of the rate regulatory process and the differences between traditional and multiobjective programming models, a multiple criteria utility rate regulation model is developed. An evaluation of the model's efficient solutions are explored next. This analysis describes an evaluation process that regulatory commissions might use in examining the trade-offs between investors and consumers. Concluding comments appear in the last section.

#### AN ELECTRIC UTILITY RATE REGULATION MODEL

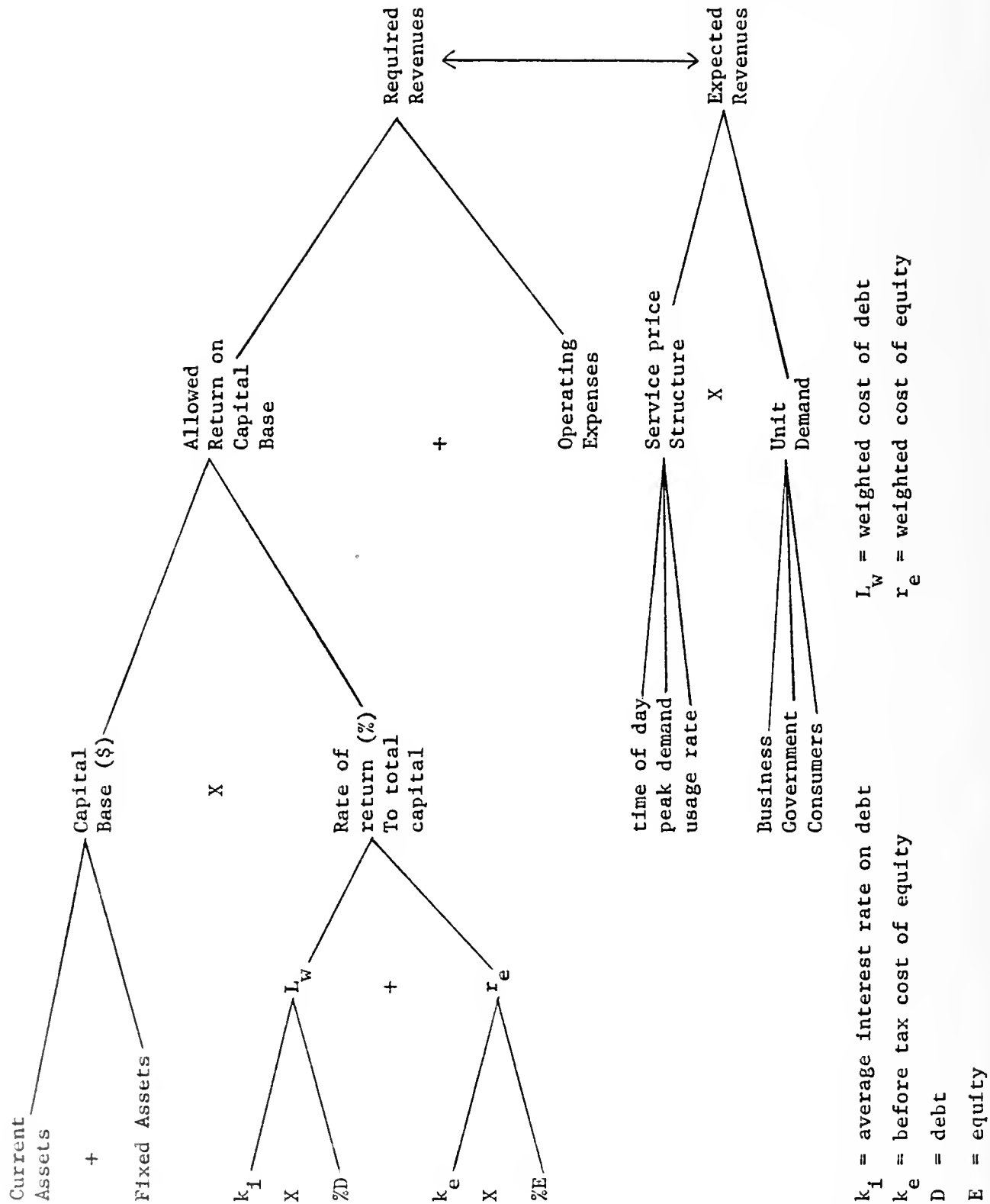
The rate making process acts as a substitute for competitive market mechanisms by determining how prices and services are to be provided at reasonable levels by profit oriented monopolies. Under a market system firms determine their operating and financial risk-return profiles via complex, interdependent decisions. These decisions are based upon the potential market(s) to be served, the alternative product generating function(s) available, and a variety of possible capital structures. Under regulation firms are constrained in the pursuit of risk-return objectives. Commissions regulate electric utilities by approving service price structures that are expected to generate sufficient revenues to allow recovery of operating costs, depreciation, interest and taxes, plus a fair return on equity investment. As such, rate regulation

affects the calculation of required revenues, the prices customers pay, and the stream of cash flows to equity investors.

Exhibit 1 presents a simplified overview of a process designed to establish "just and reasonable" rates of return. To recommend a "rate of return," a commission must first accept an appropriate capital structure for an approved capital base. Then returns on debt and equity capital are established. Finally, a weighted average of these rates is applied to the capital (rate) base. This required return to capital suppliers plus an acceptable level of operating expenses (including depreciation and taxes) determine the required revenues that must be generated. The last step in the regulatory process is to approve a service price structure that will interact with expected demand and generate the needed revenues that allow recovery of operating costs, depreciation, interest and taxes, plus a fair return to equity.

Almost all of the variables shown in Exhibit 1 are subjects of controversy in regulatory proceedings. Perhaps the greatest source of controversy is the "just and reasonable" rate of return to equity holders. Expert witnesses in a rate case often recommend widely differing rates. Other areas of regulatory controversy include the appropriate proportions of debt and equity in the capital structure, the appropriate level of the capital base, the reasonableness of the level of operating expenses, and the service price structure. There is a tendency in current regulatory practice to isolate decision areas. For example, consider the return on rate base issue which is dependent upon a given capital structure. A utility's (current or anticipated) financing policies are taken as given or as independent of the costs of debt and

Exhibit 1: An Overview Of The Rate Regulation Process



equity, even though neither theoretical nor practical considerations support such an artificial separation.

Given the interdependencies among many of these areas of controversy, rate regulation requires simultaneous consideration of the decision options facing a utility. Although a static analysis may generate reasonable regulatory decisions, it is difficult to detect if a series of regulatory decisions derived through static or partial equilibrium analysis are suboptimal. Because regulation must reflect the dynamic interdependencies of all policy variables, a simultaneous equations planning model is essential in utility regulation. A successful model should collapse a multi-stage process into a single stage decision which provides simultaneous consideration of the inherent interdependencies encountered in rate regulation.

In a recent article [4] Alexander A. Robichek offered an alternative approach to the conventional regulatory process of determining "just and reasonable" rates which recognized the need for simultaneous consideration of decision options facing a utility. Robichek's proposal followed capital asset pricing model (CAPM) logic and required the following conditions exist:

1. The utility's operating expenses are judged to be reasonable;
2. The utility's expansion policy is appropriate to the needs of the consumers;
3. The utility's financial structure is appropriate;
4. The utility's specific financing choices (e.g., of debt or equity issues) are justified; and
5. The regulation of the utility's rate of return was judged "just and reasonable" as of a previous point of time. This point of time would then serve as the starting point from which to judge the fairness of realized rates.

If these conditions are met, Robichek's regulatory approach would provide a basis for resolving some of the current conflicts in rate making.

The application of this CAPM approach would require a significant change in the current regulation process. More specifically, the approach would require. . .

- . . . the utility and the regulators to agree on the specific parameters and time period along which to measure the "just and reasonable" rate of return to equity investors;
- . . . the regulators to approve the planned major items of operating expenses, such as salaries, labor contracts, etc., and major capital commitments; and
- . . . an agreement as to the appropriate capital structure for the utility and the major financing decisions in the planning period.

Robichek argued his approach to rate-making would eliminate some of the current problems facing regulators while causing a few new ones. Some problems would remain, such as how to compensate efficiency and penalize inefficiency, how to set fair user rate schedules, and how to resolve differences of judgment between the utility and the commission staff. The programming model presented in this paper is a first step toward implementing the Robichek regulatory approach.

#### A Multiple Objective Approach to Rate Regulation

The two phase multiple objective programming algorithm and computer codes utilized in this study were developed by Ralph E. Steuer [10, 11, 12]. Unlike traditional single objective function linear programming approaches to financial planning [1, 3], phase one of Steuer's multiobjective algorithm attempts to solve the following vector maximization problem:

$$\text{eff}_X \{ Cx = Z_c \mid X \in S, C \in R^k \times R^n \}.$$

In this problem,  $S$  is a feasible region  $\{X \in R^n \mid Ax \leq b, b \in R^m\}$ ,  $C$  is a criteria matrix that linearly relates a vector of decision variables,

$x$ , to a vector of criteria values,  $Z_c$ .  $A$  is a matrix of technological coefficients that relate the decision variables to a vector of constraint values,  $b$ , and  $\text{eff}$  denotes that all efficient extreme points of  $S$  with respect to  $C$  are to be found. A point,  $\bar{x} \in S$ , is defined as efficient if and only if no other feasible point,  $\hat{x} \in S$ , exists, such that  $\hat{C}x \geq C\bar{x}$ ,  $\hat{C}x \neq C\bar{x}$ .

Although somewhat tedious, this maximization problem is relatively straightforward. It stipulates that the solution algorithm should generate all possible feasible solutions that simultaneously optimize the specified criteria. However, given the inherent trade-offs of public utility regulation, it is virtually impossible to find a single solution that will optimize all objectives simultaneously. Instead the output of the first phase of Steuer's algorithm provides a set of efficient solutions.

Phase two of the Steuer algorithm utilizes a filtering process on the phase one efficient extreme points' criteria values. Although several filtering options are available in Steuer's computer codes, this study employs the "nondominated" alternative. In this "nondominated mode" a pairwise comparison of all efficient solutions is made. All dominated or inferior points are eliminated until only nondominated solutions remain. Unfortunately an in-depth presentation of the Steuer algorithms is beyond the scope of this study; however, see [10, 11] for an enlightening review.

It is worth emphasizing an important aspect of multiobjective linear programming. These algorithms are capable of dealing only with linear constraints and objective functions. As such,

typical multiplicative relationships such as earnings, price, and dividends per share cannot be incorporated into the model unless one is willing to specify a selling price(s) per share. Because these selling prices do not consider the simultaneous nature of a given solution, their use is suspect. However, given solution values for aggregate book and market value, it is possible to derive per share figures after all nondominated solutions have been determined. Accordingly, it is necessary to filter the nondominated solutions through a second filter, which can incorporate these critical non-linear relationships and determine financially feasible and viable alternatives from the set of efficient, nondominated solutions. A detailed description of this second filtering process is given in the discussion of the model's results.

#### Formulation of the Model

As in all mathematical models, underlying assumptions are crucial. The majority of our assumptions and the variable definitions are given respectively in Exhibits 2 and 3. In this formulation, Robichek's five criteria mentioned earlier are assumed to hold.

Several aspects of Exhibit 2 are worth noting. The model will span a three year planning horizon. Initially, the utility has a capital base of \$2.5 billion, with a debt/equity ratio of 1. During the planning periods, the firm is expected to operate in an environment in which equity investors in electric utilities have a required return of 15 percent, and electric utility stocks sell at a dividend valuation multiple of 10.667. A dividend valuation multiple of 10.667 is consistent with a dividend payout of .75 and the current Standard & Poor utility index price-earnings ratio of 8.



## Operating and Financial Assumptions and Characteristics of the Model

Beginning Corporate Characteristics:

Debt = \$1,250    Equity = \$1,250    Tax Rate = 48%    Cost of Equity Capital = 15%     $\frac{\text{Stock Value}}{\text{Dividends}} = 10.667$

Projected Values, Flows, and Expenses During Planning Horizon

Period	Capital Base <sub>t-1</sub>	+	Net Investment <sub>t</sub>	=	Capital Base <sub>t</sub>	After-Tax Investment <sub>t</sub>	-	Depreciation <sub>t</sub>	=	Net Investment <sub>t</sub>	Maintenance Adjustment <sub>t</sub>	Output/ Capital Base <sub>t</sub>	Power Demand <sub>t</sub>
1	2,500	+	150	=	2,650	500	-	350	=	150	0.0	10.5	26,750
2	2,650	+	250	=	2,900	600	-	400	=	250	.015	10.5	28,075
3	2,900	+	350	=	3,250	800	-	450	=	250	.016	10.5	30,450

Old Debt @ 7.5%: \$ Values

Period t	Book Value <sub>t-1</sub>	Sinking Fund <sub>t</sub>	Book Value <sub>t</sub>	Interest Pre-Tax	Expense After-Tax	Total After- Tax Costs	Total Pre- Tax Costs
1	1,250	25	1,225	93.75	48.75	73.75	141.827
2	1,225	25	1,200	91.875	47.775	72.775	139.952
3	1,200	25	1,175	90.0	46.8	71.8	138.077
		75.0		275.625			419.856

New Debt @ 12%: Coefficient Values per \$ of Debt Issued in Period t

Period After Issuance	Pretax Rate	After- Tax Rate	Sinking Fund After-Tax	Pre-Tax	Total After- Tax Costs	Total Pre- Tax Costs	Sum Pre-tax Costs #yrs
0							
1	.12	.0624	.02	.03846	.0824	.15846	1
2	(1-.02).12 = .1176	.06115	.02	.03846	.08115	.15606	2
3	(1-.04).12 = .1152	.0599	.02	.03846	.0799	.15336	3

Exhibit 3

Variable Definitions of the Model

Variable	Definition	Algebraic Formulation	Equation
$\$AR_t$	After-tax \$ return on beginning rate base in period t	$= CB_{t-1} \times RRB_t \quad V_t$	(1)
$BVD_3$	Ending book value of all debt outstanding in period 3	$= 1,175 + .94\Delta D_1 + .96\Delta D_2 + .98\Delta D_3$	(2)
$BVE_3$	Ending book value of "old" and "new" equity outstanding in period 3	$= NW_3 + \Delta E_1 + \Delta E_2 + \Delta E_3$	(3)
$CB_t$	Rate Base or Capital Base at end of period t:	$CB_0 = 2,500$ $CB_1 = 2,650$ $CB_2 = 2,900$ $CB_3 = 3,250$	 (4.1) (4.2) (4.3) (4.4)
$CF_t$	Internal Cash Flow before Investment and dividends occurring in period t:	$CF_t = \$AR_t + \text{Depreciation}_t - \text{After-tax Debt Charges} - \text{Maintenance Adjustment}$ $CF_1 = \$AR_1 + 350 - 73.75 - .0824\Delta D_1$ $CF_2 = \$AR_2 + 400 - 72.775 - .08115\Delta D_1 - .0824\Delta D_2 - .015UD_1$ $CF_3 = \$AR_3 + 450 - 71.8 - .0799\Delta D_1 - .08115\Delta D_2 - .0824\Delta D_3 - .016UD_2$	 (5.1) (5.2) (5.3)
$\Delta D_t$	Sale of debt in period t:	$\Delta D_t \quad V_t$	
$DIV_t$	Total dividends paid in period t:	$DIV_t \quad V_t$	
$EBIT_t$	Earnings before interest and taxes in period t	$= NI_t / (1-\tau) + \text{total pretax interest expenses in period t}$ $EBIT_1 = NI_1 / .52 + 93.75 + .12\Delta D_1$ $EBIT_2 = NI_2 / .52 + .91.875 + .1176\Delta D_1 + .12\Delta D_2$ $EBIT_3 = NI_3 / .52 + 90.0 + .1152\Delta D_1 + .1176\Delta D_2 + .12\Delta D_3$	 (6.1) (6.2) (6.3)
$\Delta E_t$	Net \$ of equity sold in period t or "new equity":	$\Delta E_t \quad V_t$	
$MVE_3$	Market value of equity at the end of period 3	$= 10.667DIV_3$	(7)
$NI_t$	Total net income earned in period t	$= CF_t + \text{Sinking Fund Payments}_t - \text{Depreciation}_t$ $NI_1 = CF_1 + .02\Delta D_1 + 25 - 350$ $NI_2 = CF_2 + .02[\Delta D_1 + \Delta D_2] + 25 - 400$ $NI_3 = CF_3 + .02[\Delta D_1 + \Delta D_2 + \Delta D_3] + 25 - 450$	 (8.1) (8.2) (8.3)
$NW_t$	Net worth of value of "old" equity at the end of period t	$= NW_{t-1} + NI_t - DIV_t$ $NW_1 = 1,250 + NI_1 - DIV_1$ $NW_2 = NW_1 + NI_2 - DIV_2$ $NW_3 = NW_2 + NI_3 - DIV_3$	 (9.1) (9.2) (9.3)

Exhibit 3  
(CONTINUED)  
Variable Definitions of the Model

Variable	Definition	Algebraic Formulation	Equation
PVBE:	Present value at period 0 of initial and new equity outstanding at the end of period 3	$= 1,250 + \Delta E_1 + \Delta E_2/(1.15) + \Delta E_3/(1.15)^2$	(10)
$RRB_t$ :	Return on rate base or capital base in period t:	$RRB_t \quad V_t$	
\$ROP:	Value in \$ of regulatory overpricing at the end of period 3	$= \$ROP - \$RUP = MVE_3 - BVE_3$	(11)
\$RUP:	Value in \$ of regulatory underpricing at the end of period 3:		
TDIV:	Total dividends paid during the planning periods	$= DIV_1 + DIV_2 + DIV_3$	(12)
TEBIT:	Total earnings before interest and taxes during the planning periods	$= EBIT_1 + EBIT_2 + EBIT_3$	(13)
TFC:	Total debt related fixed charges incurred during the planning periods	$= .46818\Delta D_1 + .31452\Delta D_2 + .15846\Delta D_3 + 419.856$	(14)
TNI:	Total net income earned during the planning periods	$= NI_1 + NI_2 + NI_3$	(15)
$\tau$ :	Corporate tax rate	$= .48$	
$UD_t$ :	Unfulfilled consumer demand occurring in period t:	$UD_t = \text{anticipated demand}_t - \text{generating capacity}_t$ $UD_1 = 26,750 - 10.5CB_0$ $UD_2 = 28,075 - 10.5CB_1$ $UD_3 = 30,450 - 10.5CB_2$	 (16.1) (16.2) (16.3)

Significant growth in power demand is anticipated during the planning horizon. To accomodate this growth, major additions to the capital base are needed. Although somewhat artificial, all investments are assumed to occur at the beginning of each planning period; however as seen in equation (1) in Exhibit 3, the after-tax allowed dollar return in a given period is calculated on the basis of the previous period's ending capital base.

Equations (2) and (3) define the ending book values of debt and equity in period three. Equations (4.1) through (5.3) provide the values for end of period capital base and internal cash flow, respectively, for each period. Similarly, (6.1) through (8.3) define respective period values for earnings before interest and taxes calculated at a 48 percent rate, ending equity market value, and total dollar net income. Equations (9.1) through (9.3) define end of period net worth. In order to facilitate analysis of phase two filtering results, it was necessary to distinguish between "internal" and "external" equity funds for valuation purposes.

In equation (10) the period 0 present value of equity book value is defined. Equation (11) introduces two regulatory variables that proxy the efficiency of regulation via the discrepancy between book and market values. Equations (12) through (15) define total cumulative dividends, earnings before interest and taxes, debt related fixed charges, and net income, respectively, during the three year planning horizon. Equations (16.1) through (16.3) define per period unfulfilled consumer demand. From a technical viewpoint, this unfulfilled demand will be met by foregoing normal maintenance (downtime) procedures. However, the additional operating expenses associated with poor maintenance

will cause "unfulfilled" demand to drain cash flows in subsequent periods (see equations (5.2) and (5.3)). Four final variables require definition:  $\Delta D_t$ ,  $DIV_t$ ,  $\Delta E_t$ , and  $RRB_t$ . Respectively these are defined in period  $t$  to be sale of debt in dollars, total dollar dividends paid, net dollar value (after floatation costs) of equity sold, and return on beginning rate base.

### Objective Function Formulation

For operational purposes, the utility regulation model has five goals that are attributable to three constituencies. These constituencies, goal descriptions, and algebraic formulations are given in Exhibit 4. Equation (17) specifies a consumer oriented goal that attempts to minimize total allowed dollar returns during each of the planning periods.

Shareholder or corporate goals are specified in equations (18) through (20). The first corporate goal states that the algorithm should maximize the discounted present value of all future cash flows that accrue to shareholders as dividends. The last term in this equation represents an ending market value of aggregate equity determined by the 10.667 dividend multiple given earlier in Exhibit 2. The second shareholder goal is given in equation (10). This goal attempts to minimize possible dilution of existing equity by minimizing the sale of common stock. The final corporate goal is seen in (20); this criterion maximizes future internal corporate cash flow during the planning horizon.

Equation (21) specifies the remaining goal or criterion of the model. It attempts to suppress regulatory excess or perniciousness by equating aggregate equity book and market values.

## Objective Function Formulations of the Model

Constituency	Criterion	Algebraic Formulation	
Consumers:	Minimize total allowed return in dollars	Min: $Z_1 = \$AR_1 + \$AR_2 + \$AR_3$	(17)
Shareholders:	Maximize Present Value of Total Corporate Dividends	Max: $Z_2 = \frac{DIV_1}{(1.15)} + \frac{DIV_2}{(1.15)^2} + \frac{DIV_3 + 10.667DIV_3}{(1.15)^3}$	(18)
Shareholders:	Minimize possible dilution of existing equity by avoiding sale of common stock	Min: $Z_3 = \Delta E_1 + \Delta E_2 + \Delta E_3$	(19)
Shareholders:	Maximize corporate cash flow	Max: $Z_4 = CF_1 + CF_2 + CF_3$	(20)
Regulatory Agency:	Equate book value into market value of equity	Min: $Z_5 = \$ROP + \$RUP$	(21)

Given the conflicting nature of these five goals, it is apparent that the ability to compromise and incorporate trade-offs in the regulatory process is essential. In order to accommodate this flexibility requirement, the model has four sets of operational and financial constraints designed to specify reasonable ranges for corporate and regulatory policies. These constraint sets are given in Exhibit 5.

Equations (22) - (24.2) specify the five sets of regulatory constraints. In (22) upper and lower limits on the annual returns on beginning capital bases are given. In addition (23.1) and (23.2) provide maximum limits of 25 basis points on annual changes in returns on appropriate capital bases. The final two regulatory constraints place upper and lower limits on the ratio of equity market to book value. Equation (24.1) limits the aggregate period zero market value, less the aggregate present value of "new" stock, to be less than or equal to 110% of beginning equity book value. In similar fashion (24.2) states that these present values should be at least 90% of beginning equity book value.

The next two sets of the model's constraints are related to corporate dividend as well as financial leverage and coverage policies. Equation (25) limits the annual maximum dividend payout to be no greater than 75%, while (26) specifies a minimum dividend yield on all equity sources to be 10%. Maximum and minimum debt/equity ratios of 1.105 and .905 respectively are outlined in equations (27.1) through (28.3). Finally, minimum annual fixed coverage charges of 1.5 are given in (29.1) through (29.3).

The last two sets of constraints are given in (30.1) through (31.3). These require that each period's ending assets equal total liabilities and that all sources of cash equate to all uses in each planning period.

## Constraints of Multiple Criterion Model

## REGULATORY

Minimum and Maximum allowable returns on the rate base:

$$.09 \leq RRB_t \leq .11 \quad V_t \quad (22)$$

Maximum year to year change in return on rate base

$$RRB_t - RRB_{t-1} \leq .0025 \quad (t = 2, 3) \quad (23.1)$$

$$RRB_t - RRB_{t+1} \leq .0025 \quad (t = 1, 2) \quad (23.2)$$

Period market value - present value of "new" stock should not exceed 110% of period 0 equity book value

$$\frac{DIV_1}{(1.15)} + \frac{DIV_2}{(1.15)^2} + \frac{DIV_3 + 10.667DIV_3}{(1.15)^3} - \Delta E_1 - \frac{\Delta E_2}{(1.15)} - \frac{\Delta E_3}{(1.15)^2} \leq 1.375 \quad (24.1)$$

Period 0 market value - present value of "new stock" must be at least 90% of period 0 equity book value

$$\frac{DIV_1}{(1.15)} + \frac{DIV_2}{(1.15)^2} + \frac{DIV_3 + 10.667DIV_3}{(1.15)^3} - \Delta E_1 - \frac{\Delta E_2}{(1.15)} - \frac{\Delta E_3}{(1.15)^2} \geq 1.125 \quad (24.2)$$

## DIVIDEND POLICY

Maximum Dividend Payout of 75%

$$DIV_t \leq .75NI_t \quad V_t \quad (25)$$

Minimum Dividend Yield of 10%

$$DIV_t \geq .1NW_t + .1 \sum_{T=1}^t \Delta E_T \quad V_t \quad (26)$$

## FINANCIAL LEVERAGE COVERAGE

Maximum debt ceiling: do not allow debt/equity ratio to exceed 1.105 in any year

$$t = 1 \quad 1.105[NW_1 + \Delta E_1] \geq 1.225 + .98\Delta D_1 \quad (27.1)$$

$$t = 2 \quad 1.105[NW_2 + \Delta E_1 + \Delta E_2] \geq 1.200 + .96\Delta D_1 + .93\Delta D_2 \quad (27.2)$$

$$t = 3 \quad 1.105[NW_3 + \Delta E_1 + \Delta E_2 + \Delta E_3] \geq 1.175 + .94\Delta D_1 + .96\Delta D_2 + .98\Delta D_3 \quad (27.3)$$

Minimum debt limits: do not allow debt/equity ratio to fall below .905 in any year

$$t = 1 \quad .905[NW_1 + \Delta E_1] \leq 1.225 + .98\Delta D_1 \quad (28.1)$$

$$t = 2 \quad .905[NW_2 + \Delta E_1 + \Delta E_2] \leq 1.200 + .96\Delta D_1 + .96\Delta D_2 \quad (28.2)$$

$$t = 3 \quad .905[NW_3 + \Delta E_1 + \Delta E_2 + \Delta E_3] \leq 1.175 + .94\Delta D_1 + .96\Delta D_2 + .98\Delta D_3 \quad (28.3)$$

Fixed charge coverage should be at least 1.5 in each year

$$t = 1 \quad .667EBIT_1 \geq .15846\Delta D_1 + 141.827 \quad (29.1)$$

$$t = 2 \quad .667EBIT_2 \geq .15606\Delta D_1 + .15846\Delta D_2 + 139.952 \quad (29.2)$$

$$t = 3 \quad .667EBIT_3 \geq .15366\Delta D_1 + .15606\Delta D_2 + .15846\Delta D_3 + 138.007 \quad (29.3)$$

## SOURCES OF FUNDS EQUAL USES

Assets equal liabilities for each period

$$t = 1 \quad CB_1 = NW_1 + \Delta E_1 + 1.225 + .98\Delta D_1 \quad (30.1)$$

$$t = 2 \quad CB_2 = NW_2 + \Delta E_1 + \Delta E_2 + 1.200 + .96\Delta D_1 + .98\Delta D_2 \quad (30.2)$$

$$t = 3 \quad CB_3 = NW_3 + \Delta E_1 + \Delta E_2 + \Delta E_3 + 1.175 + .94\Delta D_1 + .96\Delta D_2 + .98\Delta D_3 \quad (30.3)$$

Sources of cash equal uses of cash for each period

$$t = 1 \quad \Delta E_1 + \Delta D_1 - DIV_1 + CF_1 = 500 \quad (31.1)$$

$$t = 2 \quad \Delta E_2 + \Delta D_2 - DIV_2 + CF_2 = 650 \quad (31.2)$$

$$t = 3 \quad \Delta E_3 + \Delta D_3 - DIV_3 + CF_3 = 800 \quad (31.3)$$

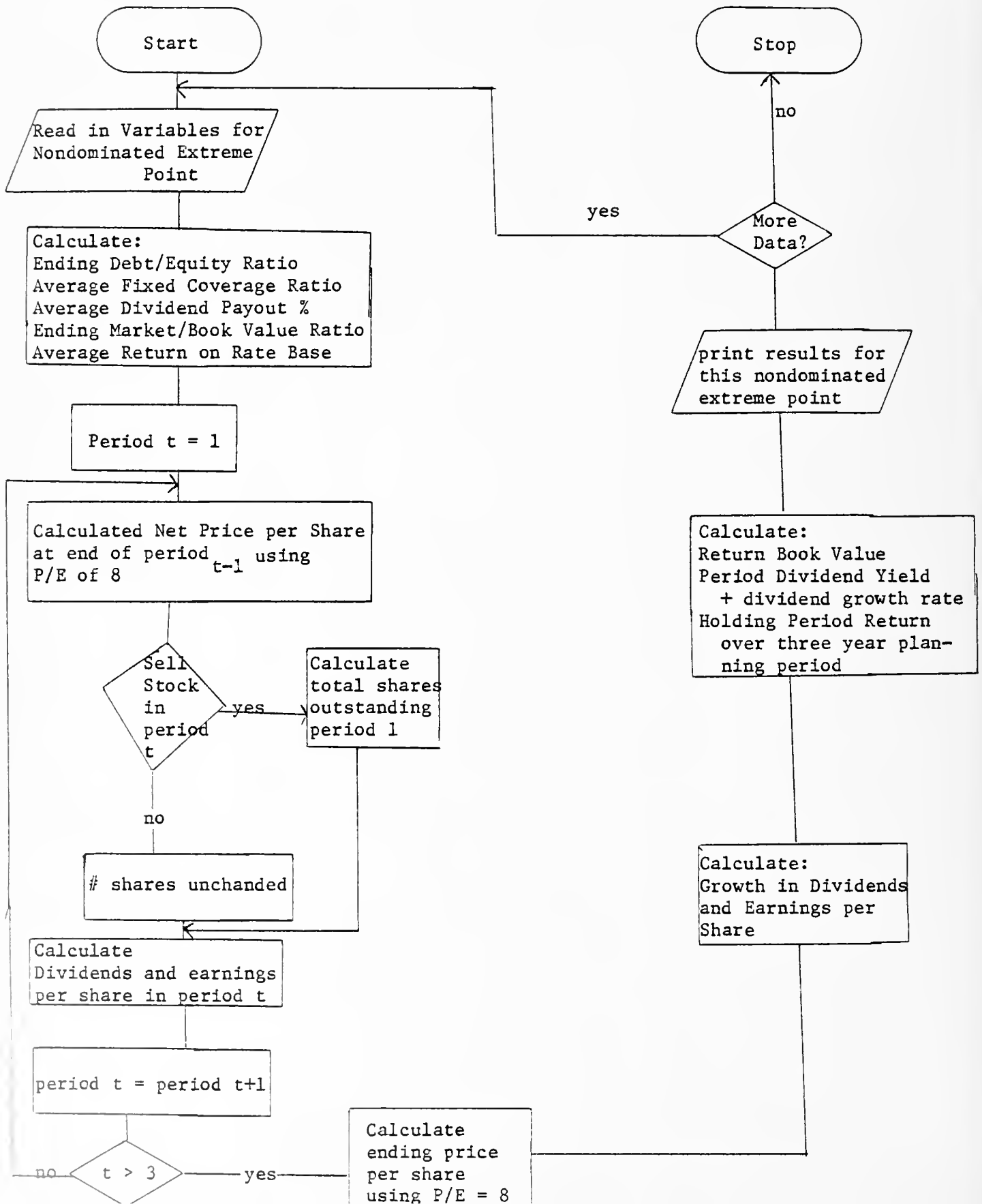


## THE RESULTS

The initial filtering phase generated 224 nondominated extreme points from over 352 efficient solutions. The linear requirements of the Steuer algorithm did not allow calculation of per share data [such as earnings per share (EPS), dividends per share (DPS), book value per share (BVPS)] or profitability and leverage ratios to aid in the evaluation of the relative attractiveness of the 224 nondominated extreme points. This was done outside the Steuer algorithm using assumptions consistent with the original model and financial theory. A flow chart of the second filtering phase is contained in Exhibit 6. Values generated by the Steuer algorithm permitted calculation of the ending debt/equity ratio, return on book value, average fixed coverage ratio, average dividend payout percentage, ending market/book value ratio, and the average return on rate base. Share data were derived after first estimating the number of equity shares issued to raise the amount of common stock financing in each time period for each Steuer algorithm solution. A stock market price at time period zero ( $P_0$ ) was estimated by multiplying time period zero BVPS ( $BVPS_0$ ) by the ending (aggregate) market/book value ratio from the Steuer algorithm. This price determination procedure assumes investors will correctly anticipate the performance of the firm in the three year planning horizon. The selling price of a common share at the beginning of time period one ( $SP_1$ ) is  $.95 P_0$  to allow for market pressure and selling costs.

The number of common shares outstanding in time period one is calculated by adding the number of shares at the beginning of the period and the number issued at  $SP_1$  to raise the amount of common

## Flow Chart of the Second Filtering Phase



stock financing in period one.  $EPS_1$  and  $DPS_1$  can then be derived and provide the inputs for estimating  $P_1$  and  $SP_2$  as follows:

$$P_1 = 8.0 \text{ } EPS_1; \text{ and}$$

$$SP_2 = (.95)(P_1) = (.95)(8.0 \text{ } EPS_1).$$

The 8.0 P/E valuation multiple is admittedly a somewhat arbitrary choice. However, a valuation procedure outside the Steuer algorithm is a necessity if share data are to be considered in evaluating the 224 nondominated extreme points.

$EPS_t$ ,  $DPS_t$ ,  $P_t$ , and  $SP_t$  values are estimated in similar fashion for periods two and three. These share data allow estimation of investor related variables such as the growth in EPS ( $G_{eps}$ ) and DPS ( $G_{dps}$ ), and the holding period return realized by investors over the three period planning horizon. Share data also permit estimation of equity investors' required rate of return ( $k_e$ ) using the Gordon infinite horizon DCF model.

The 224 nondominated extreme points were based on linear constraints and objective functions. The introduction of the multiplicative relationships of EPS, DPS, and price per share had a dramatic impact on the financial viability of the nondominated solution points. In evaluating the 224 nondominated solutions, two realistic financial constraints were introduced to assure feasibility:

$$(1) \quad DPS_1 \leq DPS_2 \leq DPS_3; \text{ and}$$

$$(2) \quad [(1+g_{EPS}) - g_{DPS}]^{10} [\text{Average Payout Ratio}] \leq .75.$$

The dividend constraint precludes any reduction in DPS over the planning period while the second constraint assures that any disparity between  $G_{eps}$  and  $G_{dps}$  will be sustainable over a decade without causing the dividend payout ratio to exceed the .75 limit contained in the original model. Only seven of the 224 nondominated extreme point solutions met these two financial feasibility constraints.

Financial data for these seven feasible solutions are organized in Exhibit 8 to reflect the particular interests of the various parties to the rate regulatory process. Similar data for all 224 nondominated efficient solutions are presented in Appendices 1 and 2. Spearman rank order correlation coefficients measuring the correspondence between the (low to high) rankings of each financial variable in Exhibit 7 plus a variable for the volume of common stock issued are shown in Exhibit 8. As might be anticipated with a simultaneous equation model, the systematic associations between the variable have the expected signs and are often significant even when tested with a nonparametric measure.

The data contain few surprises. Return on book value is systematically related to the allowed return on rate base and the debt/equity ratio. Coverage ratios track well with debt/equity ratios. EPS and DPS growth rates as well as the payout and coverage ratios are consistent with the utility industry.

However, only three of the nondominated extreme point solutions, numbers 57, 124, and 204, appear to provide plausible planning guides. Even for these three solutions, the relationships between some of the variables may not appear consistent with traditional rate base regulatory procedures. For example, the utility represented by extreme point 57 would

Exhibit 7

Selected Variables Associated With Nondominated Efficient Solutions

NONDOMINATED EXTREME POINT	UTILITY				CONSUMERS		INVESTORS			REGULATORY COMMISSION	
	Return on Book Value	Debt to Equity	Fixed Coverage	Payout Ratio	k <sub>e</sub>	Return on Rate Base	HPR	Growth in EPS	Growth in DPS	Market to Book	
57	.1568	1.105	3.023	.657	.1429	10.876	.102	.0415	.0535	1.067	
124	.1551	1.105	2.987	.666	.1416	10.762	.098	.0510	.0520	1.067	
204	.1444	1.105	2.816	.727	.1363	10.083	.085	.0353	.0385	1.067	
286	.1406	1.105	2.728	.750	.1221	9.899	.047	.0179	.0179	1.067	
338	.1407	1.004	2.810	.750	.1223	9.659	.048	.0182	.0182	1.067	
339	.1371	1.105	2.606	.750	.1216	9.796	.046	.0171	.0171	1.067	
352	.1371	1.091	2.616	.750	.1216	9.805	.046	.0172	.0172	1.067	

Rank Correlations Between Selected Variables of Financially Feasible Nondominated Efficient Solution

	Return on Rate Base	Return on Book Value	Debt Equity Ratio	Fixed Coverage Ratio	Payout Ratio	HPR	Growth Rate		Increase in Common Stock	$k_e$
							EPS	DPS		
Return on Rate Base	1.00									
Return on Book Value	.95*	1.00								
Debt/Equity Ratio	.52	.27	1.00							
Fixed Coverage Ratio	.95**	1.00**	.27	1.00						
Payout Ratio	-.91*	-.91*	-.52	-.91*	1.00					
HPR	.96**	.99**	.34	.99**	.91*	1.00				
EPS Growth Rate	.92*	.96**	.27	.96**	-.87*	.95	1.00			
DPS Growth Rate	.95**	1.00	.27	1.00**	-.91*	.99**	.96**	1.00		
Increase in Common Stock	-.88*	-.75	-.80*	-.75	.91*	-.77	-.71	-.75	1.00	
$k_{e0} = D_1/P_0 + g_{dps}$	.96**	.99**	1.00**	.99**	-.91*	1.00	.95**	.99	-.77	1.00

have to have a pre-tax debt cost that exceeded stockholders' required return ( $k_e$ ) of 14.29 percent in order to have a weighted average cost of capital equal to the average 10.876 percent return on rate base. Of course an allowed return on rate base in excess of the firm's cost of capital would certainly explain a market/book ratio greater than unity.

A partial explanation of this apparent disparity revolves around the existence of a sinking fund in the model which increases the required return on the rate base by nearly 2.0 percent. In addition, traditional analyses focuses on end of period values while the return on rate base percentage is an average of beginning of period rates.

Solution points 57, 124, and 204 have stockholder required rates of return ( $k_e = D_1/P_0 + G_{dps}$ ) that exceed projected holding period returns (HPR). This relationship is consistent with what has occurred with electric utility stocks in the past decade, but it is not descriptive of a well functioning rate regulatory process.

#### CONCLUDING OBSERVATIONS

The interests of the three parties to the regulatory process--the utility investors, the consumers, and the regulators--are often in conflict. Investors are concerned with shareholder wealth maximization while consumers desire dependable service at low rates. If the desired end product of regulation is to establish rates that balance the interests of consumers and investors, then a planning model is needed which accurately reflects the multiobjective nature of the regulatory decision process. This paper develops such a multiobjective programming model for examining the efficient trade-offs available to utility regulators in setting rates of return.

Generally the initial runs of the model are promising and supportive of a simultaneous decision approach to rate regulation. There are several possible explanations for some of the aberrations in the data. The dynamics of the evaluation procedures need further study. Ultimately a nonlinear programming model may be required in order for multiplicative share data manipulations and valuation to become an integral part of the primary model. Another area for study is the impact rapid growth in the capital budget may have upon economic rates of return and reported accounting returns. Study of this phenomena which has been explored elsewhere [5, 9] may provide a partial explanation of some of the low HPR-high return on book value combinations in Exhibit 8. This phenomena may also give insight into the impact of inflation on utility regulation and operation.

M/E/225



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## APPENDIX 1

NONOUMINATED  
EXTREME  
POINT  
NUMBER

UTILITY

INVESTORS

REGULATORY COMMISSION

CONSUMERS

=====	DEBT TO EQUITY	FIXED COVERAGE	PAYOUT RATIO	RETURN ON BV	HPR	GROWTH OF EPS	GROWTH OF DPS	MARKET TO BOOK VALUE	RETURN ON RATE BASE
=====	=====	=====	=====	=====	=====	=====	=====	=====	=====
2	1.0309	1.1649	.5570	.1582	.114	.0132	.0546	1.0666700	11.0000
5	1.1050	3.05561	.6471	.1584	.104	.0230	.0542	1.0666700	11.0000
6	1.1050	3.05531	.6492	.1581	.104	.0187	.0535	1.0666700	10.9772
7	1.1050	3.05595	.6501	.1585	.127	.0227	.0598	1.0793669	11.0000
8	1.0500	2.2702	.6659	.1559	.131	.0040	.0555	1.0666700	11.0000
10	1.0309	1.1649	.6992	.1603	.069	.0132	.0406	1.0666700	11.0000
13	1.0399	1.1320	.6635	.1567	.116	.0133	.0523	1.0666700	10.9099
14	1.0342	1.1624	.6607	.1582	.147	.0129	.0624	1.0843923	11.0000
16	1.1050	3.05561	.6898	.1606	.078	.0230	.0413	1.0666700	11.0000
17	1.1050	3.05531	.6919	.1602	.076	.0187	.0415	1.0666700	10.9772
18	1.1050	3.05595	.6927	.1607	.068	.0227	.0359	1.0793669	11.0000
19	1.1050	3.05595	.6381	.1567	.119	.0153	.0586	1.0666700	11.0000
22	1.1050	3.0341	.6544	.1568	.106	.0051	.0518	1.0666700	10.9099
23	1.1050	3.0312	.6552	.1571	.102	.0332	.0535	1.0666700	10.8995
26	1.1050	3.0376	.6561	.1575	.127	.0372	.0598	1.0793669	10.9224
27	1.0500	2.2702	.6730	.1559	.191	.0053	.0691	1.0972558	11.0000
28	1.0500	2.2468	.6720	.1550	.129	.0097	.0550	1.0666700	10.9224
29	1.0500	2.2702	.6777	.1583	.057	.0040	.0397	1.0666700	11.0000
32	1.0500	2.2431	.6736	.1543	.134	.0208	.0535	1.0666700	10.9099
33	1.0353	1.1390	.6680	.1573	.156	.0267	.0646	1.0904258	10.9224
35	1.0309	1.0956	.6759	.1549	.104	.0396	.0515	1.0666700	10.7624
36	1.0399	1.1094	.6696	.1557	.114	.0104	.0450	1.0666700	10.8323
37	1.0309	1.0949	.7232	.1609	.072	.0085	.0450	1.0666700	11.0000
38	1.0349	1.1619	.7036	.1604	.054	.0128	.0319	1.0889371	11.0000
39	1.0309	1.1409	.7060	.1590	.071	.0113	.0424	1.0666700	10.9177
41	1.0399	1.1320	.7061	.1588	.064	.0033	.0427	1.0666700	10.9099
46	1.0489	1.0753	.5767	.1538	.112	.0219	.0480	1.0666700	10.7376
47	1.0441	1.1283	.6682	.1567	.081	.0038	.0624	1.0896733	10.9099
48	1.1050	3.05595	.7185	.1614	.081	.0174	.0465	1.0666700	11.0000
49	1.1050	3.0390	.6979	.1591	.071	.0051	.0431	1.0666700	10.9099
51	1.1050	3.05595	.6430	.1555	.121	.0291	.0592	1.0666700	10.9224
52	1.1050	3.0659	.6407	.1567	.141	.0148	.0640	1.0784938	11.0000
57	1.1050	3.0230	.6569	.1568	.102	.0415	.0535	1.0666700	10.8764
58	1.1050	3.0300	.6532	.1571	.097	.0212	.0520	1.0666700	10.9177
61	1.1050	3.0171	.6610	.1559	.106	.0194	.0517	1.0666700	10.8323
62	1.1050	3.0416	.6593	.1569	.141	.0042	.0605	1.0882547	10.9099
63	1.1050	3.0799	.6676	.1537	.103	.0152	.0474	1.0666700	10.7376
64	1.1050	3.0122	.6609	.1558	.106	.0194	.0518	1.0666700	10.8323
65	1.1050	3.0341	.6584	.1568	.104	.0043	.0607	1.0866747	10.9099
68	1.1050	3.0386	.6578	.1575	.140	.0369	.0629	1.0885222	10.9224
69	1.1050	3.0306	.6575	.1571	.132	.0204	.0608	1.0864035	10.9177
73	1.0500	2.2450	.6807	.1547	.189	.0068	.0684	1.1025565	10.9177
75	1.0500	2.2702	.7155	.1580	.031	.0055	.0259	1.1007303	11.0000
76	1.0500	2.2468	.6804	.1550	.201	.0081	.0712	1.1030063	10.9224
77	1.0500	2.2431	.6814	.1543	.205	.0224	.0696	1.1030966	10.9099
78	1.0500	2.1987	.6848	.1527	.116	.0210	.0515	1.0666700	10.7624
79	1.0500	2.2468	.7073	.1567	.064	.0097	.0265	1.0666700	10.9224
80	1.0500	2.2702	.6791	.1533	.132	.0307	.0530	1.0666700	10.8323
83	1.0500	2.2702	.7314	.1586	.060	.0086	.0441	1.0666700	11.0000
84	1.0500	2.2431	.7151	.1563	.051	.0209	.0416	1.0666700	10.9099
87	1.0500	2.1912	.6868	.1514	.127	.0406	.0483	1.0666700	10.7376
88	1.0374	1.0963	.6834	.1550	.169	.0389	.0679	1.1020393	10.7624
92	1.0399	1.1034	.7057	.1574	.084	.0104	.0295	1.0666700	10.8323
93	1.0517	1.0412	.7250	.1459	.083	.0295	.0396	1.0666700	10.1847
94	1.0638	1.0414	.7253	.1454	.083	.0033	.0385	1.0666700	10.1732
95	1.0352	1.1617	.7279	.1610	.054	.0031	.0357	1.0898409	11.0000
96	1.0399	1.1320	.7303	.1594	.067	.0079	.0471	1.0666700	10.9099
99	1.0349	1.1252	.7116	.1589	.052	.0038	.0319	1.0933376	10.9099
104	1.0399	1.1372	.7116	.1591	.052	.0108	.0315	1.0936020	10.9177
107	1.0517	1.0575	.7203	.1559	.061	.0219	.0466	1.0666700	10.7376
108	1.0551	1.0708	.7107	.1480	.094	.0001	.0411	1.0666700	10.3400
109	1.0538	1.0946	.6839	.1533	.171	.0226	.0629	1.1006272	10.7376
110	1.1050	3.0659	.7110	.1475	.103	.0315	.0399	1.0666700	10.3285
111	1.1050	3.0659	.7227	.1614	.067	.0166	.0385	1.0882422	11.0000
112	1.1050	3.0422	.7263	.1598	.075	.0005	.0434	1.0666700	10.9099
113	1.1050	3.0996	.7032	.1591	.054	.0041	.0337	1.0900660	10.9099
115	1.1050	3.0437	.7132	.1561	.087	.0152	.0470	1.0666700	10.7376
116	1.1050	3.0761	.6470	.1555	.156	.0284	.0673	1.0846557	10.9224
124	1.1050	3.0869	.6541	.1529	.113	.0410	.0571	1.0666700	10.7624
127	1.1050	3.0869	.6656	.1551	.098	.0510	.0520	1.0666700	10.7624
128	1.1050	3.0821	.7124	.1664	.038	.0287	.0385	1.0666700	10.2544
129	1.1050	3.0808	.6766	.1541	.159	.0165	.0613	1.0981094	10.7376
130	1.1050	3.0821	.7271	.1643	.093	.0004	.0375	1.0666700	10.0991
131	1.1050	3.0799	.6669	.1560	.153	.0182	.0632	1.0925625	10.8323
132	1.1050	3.0833	.6748	.1537	.160	.0166	.0618	1.0993116	10.7376
133	1.1050	3.0833	.7084	.1457	.096	.0290	.0382	1.0666700	10.2544
134	1.1050	3.0833	.6662	.1558	.154	.0183	.0635	1.0930290	10.3323
135	1.1050	3.0952	.7230	.1636	.096	.0010	.0382	1.0666700	10.0992
137	1.1050	3.0952	.6734	.1552	.156	.0499	.0660	1.0986443	10.7624
140	1.1050	3.0952	.6727	.1571	.157	.0495	.0664	1.0991120	10.7624
141	1.1050	3.0952	.7117	.1571	.028	.0047	.0240	1.1033347	11.0000
142	1.1050	3.0952	.6944	.1593	.042	.0368	.0178	1.0897928	10.9224
144	1.1050	3.0952	.7237	.1567	.031	.0085	.0266	1.1060319	10.9177
146	1.1050	3.0952	.6904	.1523	.204	.0276	.0688	1.1091359	10.8162
149	1.1050	3.0952	.6960	.1527	.088	.0189	.0723	1.1140575	10.7624
150	1.1050	3.0952	.7296	.1586	.034	.0102	.0298	1.1224482	11.0000
151	1.1050	3.0952	.7244	.1563	.021	.0225	.0255	1.1055712	10.9099
152	1.1050	3.0952	.7164	.1567	.008	.0080	.0104	1.1059185	10.9224
153	1.1050	3.0952	.6891	.1533	.215	.0392	.0716	1.1098471	10.8323
154	1.1050	3.0952	.7138	.1541	.026	.0210	.0156	1.0666700	10.7624
156	1.1050	3.0952	.7148	.1550	.035	.0073	.0284	1.0666700	10.8323
157	1.1050	3.0952	.7179	.1480	.118	.0162	.0445	1.0666700	10.4884
159	1.1050	3.0952	.7232	.1571	.063	.0100	.0455	1.0666700	10.9177
161	1.1050	3.0952	.7239	.1534	.049	.0406	.0463	1.0666700	10.7376
163	1.1050	3.0952	.7391	.1569	.054	.0254	.0460	1.0666700	10.9099
164	1.1050	3.0952	.7211	.1457	.099	.0219	.0388	1.0666700	10.3400
165	1.1050	3.0952	.6899	.1514	.148	.0411	.0540	1.0794379	10.7376
166	1.1050	3.0952	.7283	.1500	.093	.0433	.0461	1.0666700	10.6437
168	1.1050	3.0952	.7124	.1491	.020	.0303	.0709	1.1329376	10.3122
170	1.1050	3.0952	.7056	.1510	.019	.0033	.0676	1.1170211	10.8323
171	1.1050	3.0952	.7392	.1465	.010	.0293	.0083	1.0666700	10.1847
172	1.1050	3.0952	.7446	.1463	.092	.0033	.0333	1.0666700	10.1632
174	1.1050	3.0952	.7357	.1433	.092	.0054	.0363	1.0666700	10.1632
175	1.1050	3.0952	.7352	.1461	.092	.0054	.0363	1.1145589	10.1632
176	1.1050	3.0952	.7362	.1595	.092	.0054	.0363	1.0951502	10.9099
179	1.1050	3.0952	.7373	.1564	.092	.0054	.0363	1.0666700	10.7376
181	1.1050	3.0952	.7447	.1490	.092	.0054	.0363	1.1043147	10.7376
185	1.1050	3.0952	.7447	.1490	.092	.0054	.0363	1.0666700	10.3285
186	1.0599	2.9726	.7173	.1492	.197	.0001	.0677	1.1246575	10.4100

NONOINATED  
EXTREME  
POINT  
NUMBER

UTILITY

INVESTORS

REGULATORY COMMISSION

CONSUMERS

DEBT TO EQUITY	FIXED COVERAGE	PAYOUT RATIO	RETURN ON BV	HPR	OF EPS	GROWTH OF OPS	MARKET TO BOOK VALUE	RETURN ON RATE BASE
187	1.0538	2.9151	.7209	.098	-.0236	.0381	1.0666700	10.2206
188	1.0536	2.9518	.7213	.174	-.0011	.0620	1.1145589	10.3400
189	1.0629	3.0325	.6952	.182	-.0255	.0620	1.1097324	10.6195
191	1.1050	3.0423	.7318	-.057	-.0015	-.0381	1.0922340	10.9099
192	1.1050	3.0393	.7237	-.046	-.0307	-.0227	1.0919282	10.9224
193	1.1050	3.0368	.7341	-.070	-.0191	-.0508	1.0666700	10.7376
194	1.1050	3.0209	.7041	-.032	-.0180	-.0177	1.0957568	10.8323
195	1.1050	3.0013	.7213	-.042	-.0167	-.0329	1.1019206	10.7376
196	1.1050	2.9721	.7445	-.028	-.0287	-.0287	1.0666700	10.2544
197	1.1050	2.9954	.7036	-.013	-.0492	-.0009	1.1012217	10.7624
198	1.1050	2.8761	.6608	.173	-.0397	.0706	1.0970003	10.7624
199	1.1050	2.7561	.6826	.105	-.0315	.0501	1.0666700	10.3967
202	1.1050	2.7387	.6906	.098	-.0051	.0442	1.0666700	10.3137
203	1.1050	2.8600	.7111	.088	-.0044	.0394	1.0666700	10.2384
204	1.1050	2.8163	.7278	.085	-.0353	.0385	1.0666700	10.0832
205	1.1050	2.7463	.7354	.083	-.0330	.0366	1.0666700	9.9659
206	1.1050	2.7898	.7202	.084	-.0009	.0366	1.0666700	10.1211
207	1.1050	2.9550	.6958	.180	-.0221	.0637	1.1115249	10.5529
208	1.1050	2.8406	.7228	.093	-.0203	.0367	1.0666700	10.1438
209	1.1050	2.9266	.7044	.195	-.0074	.0670	1.1207289	10.4542
210	1.1050	2.9280	.7444	.015	-.0004	.0004	1.0666700	10.0991
211	1.1050	2.7965	.7379	.089	-.0095	.0356	1.0666700	9.9885
212	1.1050	2.9263	.6923	.181	-.0221	.0643	1.1127254	10.5610
213	1.1050	2.7710	.7267	.086	-.0138	.0347	1.0666700	10.0540
214	1.1050	2.8997	.7030	.200	-.0080	.0690	1.1211668	10.4619
215	1.1050	2.7276	.7421	.086	-.0179	.0347	1.0666700	9.8987
216	1.1050	2.8943	.7183	.196	-.0043	.0679	1.1278677	10.3413
217	1.1050	2.8660	.7295	.212	-.0357	.0717	1.1363716	10.2431
219	1.1050	2.5592	.7119	.197	-.0042	.0684	1.1293787	10.3520
220	1.1050	2.8327	.7252	.218	-.0364	.0731	1.1378201	10.2529
222	1.1050	2.9869	.7029	.012	-.0494	-.0005	1.1017084	10.7624
223	.9050	3.1139	.7125	-.004	-.0093	-.0080	1.1085229	10.9224
225	.9050	3.2172	.7331	-.021	-.0262	-.0262	1.1121011	10.8241
226	.9050	3.2454	.7406	-.033	-.0118	.0293	1.1072300	10.9177
228	.9050	3.1790	.7023	.207	-.0147	.0696	1.1174524	10.6972
229	.9050	3.2312	.6852	.207	-.0270	.0695	1.1056484	10.8705
230	.9050	3.1987	.7256	.020	-.0187	.0649	1.1164073	10.7624
232	.9050	3.1493	.7126	.220	-.0145	.0730	1.1251358	10.5985
234	.9050	3.2431	.7488	-.024	-.0271	-.0294	1.1082891	10.9099
235	.9050	3.2352	.7271	-.019	-.0256	-.0256	1.1082654	10.8837
236	.9050	3.2197	.7254	-.003	-.0093	-.0100	1.11117593	10.8323
237	.9050	3.2129	.6913	.217	-.0098	.0717	1.1103700	10.8098
239	.9050	3.3247	.7361	.096	-.0069	.0381	1.0688736	10.1847
240	.9050	3.3029	.7361	.093	-.0059	.0370	1.0666700	10.1789
241	.9050	3.1161	.7353	-.008	-.0162	-.0162	1.0666700	10.4884
242	.9050	3.0714	.7494	-.020	-.0219	-.0229	1.0666700	10.3400
243	.9050	3.1912	.7470	-.051	-.0437	-.0493	1.0666700	10.7376
245	.9050	3.1912	.7329	-.040	-.0411	-.0411	1.0794379	10.7376
246	.9050	3.1629	.7355	.043	-.0432	-.0432	1.0666700	10.6437
248	.9050	3.0714	.7217	.132	-.0220	.0397	1.0688736	10.3400
249	1.0593	2.9466	.7458	.079	-.0306	-.0306	1.1339108	10.3190
251	1.0461	3.1044	.7373	-.027	-.0049	-.0204	1.1006278	10.8323
252	1.0603	3.0078	.7338	.023	-.0034	-.0034	1.1186339	10.5329
254	1.0666	2.8709	.7500	.073	-.0235	.0285	1.1145589	10.1847
255	1.0638	2.8702	.7500	.024	-.0054	.0054	1.0666700	10.0553
256	1.1050	3.0253	.7332	.163	-.0333	.0596	1.1148971	10.1002
258	1.1050	3.0701	.7458	-.036	-.0259	-.0259	1.1055880	10.7376
259	1.1050	3.0633	.7500	.031	-.0325	-.0325	1.0666700	10.3285
260	1.1050	3.1090	.7328	-.026	-.0296	-.0296	1.1099518	10.7376
261	1.1050	3.0373	.7356	-.021	-.0251	-.0251	1.1110718	10.6357
262	1.1050	2.9760	.7475	-.018	-.0003	-.0003	1.1263562	10.4218
263	1.1050	2.9151	.7500	-.020	-.0236	-.0236	1.0666700	10.2206
264	1.1050	2.9518	.7500	.015	-.0011	-.0011	1.1145589	10.3400
266	1.1050	2.8704	.7234	.167	-.0026	.0606	1.1148971	10.2555
268	1.1050	3.0211	.7329	.036	-.0122	-.0223	1.0979199	10.8323
269	1.1050	2.9294	.7330	.029	-.0076	.0676	1.1215704	10.4645
270	1.1050	2.9592	.7349	.018	-.0218	-.0218	1.1138122	10.5681
271	1.1050	2.7077	.6961	.218	-.0248	.0754	1.1245025	10.3967
273	1.1050	2.7077	.6989	.113	-.0070	.0454	1.0666700	10.2166
276	1.1050	2.9865	.7380	.089	-.0136	.0359	1.0666700	9.8048
277	1.1050	2.7481	.7026	.210	-.0270	.0714	1.1279321	10.3400
279	1.1050	2.7619	.7032	.104	-.0340	.0606	1.0666700	10.1789
280	1.1050	2.7387	.7040	.199	-.0077	.0689	1.1236078	10.3137
281	1.1050	2.6371	.7234	.090	-.0188	.0361	1.0666700	9.9600
282	1.1050	2.7463	.7422	.125	-.0316	.0487	1.0946901	9.9659
283	1.1050	2.7498	.7259	.126	-.0005	.0487	1.0946901	9.9659
284	1.1050	2.6881	.7259	.087	-.0158	.0350	1.0666700	9.9507
285	1.1050	2.7276	.7500	.087	-.0179	.0179	1.0666700	9.8987
286	1.1050	2.9370	.7422	.087	-.0182	.0350	1.0666700	9.9659
287	1.1050	2.9737	.7453	.024	-.0243	-.0045	1.1294969	10.3524
288	1.1050	2.9737	.7253	-.016	-.0444	-.0444	1.1042673	10.7624
289	1.1050	3.1333	.7213	-.025	-.0202	-.0076	1.1193063	10.7624
290	1.1050	3.1667	.7497	-.021	-.0273	-.0273	1.1122181	10.9099
291	1.1050	3.1835	.7390	-.005	-.0144	-.0144	1.1194645	10.7120
292	1.1050	3.2131	.7500	.023	-.0289	-.0289	1.1131243	10.8268
293	1.1050	3.1522	.7373	.045	-.0147	-.0147	1.1264740	10.6083
294	1.1050	3.1987	.7429	.016	-.0152	-.0003	1.1176063	10.7624
295	1.1050	3.2371	.7500	-.023	-.0293	-.0293	1.1095142	10.8901
296	1.1050	3.2172	.7263	.004	-.0069	-.0069	1.1123030	10.8240
297	1.1050	3.0247	.7500	.027	-.0069	-.0069	1.0688736	10.1847
298	1.1050	3.0247	.7500	.025	-.0069	-.0069	1.0666700	10.1789
299	1.1050	3.1629	.7500	.045	-.0088	-.0088	1.0666700	10.6437
300	1.1050	2.9470	.7500	.077	-.0297	.0280	1.1341152	10.3204
301	1.1050	3.0095	.7500	.018	-.0003	-.0003	1.1194911	10.5385
302	1.1050	3.0267	.7500	.094	-.0333	-.0333	1.1148971	10.1002
303	1.1050	3.0387	.7500	.024	-.0277	-.0277	1.1117993	10.6408
304	1.1050	3.1365	.7500	.029	-.0324	-.0324	1.1099258	10.7106
305	1.1050	3.0704	.7500	.020	-.0026	-.0026	1.1148971	10.2555
306	1.1050	3.0606	.7500	.021	-.0245	-.0245	1.1274255	10.5733
307	1.1050	3.4310	.7500	.089	-.0043	-.0043	1.1274255	10.4702
308	1.1050	3.4811	.7500	.089	-.0043	-.0043	1.1274255	10.2506
309	1.1050	3.7111	.7129	.109	-.0094	.0768	1.1358863	10.2401
310	1.1050	3.7075	.7103	.142	-.0077	.0451	1.0666700	10.2994
311	1.1050	3.5395	.7031	.094	-.0134	.0376	1.0924575	10.2166
312	1.1050	3.6905	.7260	.092	-.0140	.0369	1.0704742	9.8741
313	1.1050	3.8100	.7500	.048	-.0182	.0182	1.0666700	9.9659
314	1.1050	3.8051	.7500	.071	-.0171	-.0171	1.0666700	9.9659
315	1.1050	3.8776	.7500	.043	-.0039	.0039	1.1276522	10.3537
316	1.1050	3.0919	.7305	.049	-.0164	.0166	1.1285353	10.6236
317	.9050	3.1217	.7449	.021	-.0156	-.0042	1.1216221	10.7624
318	.9050	3.1846	.7500	.007	-.0164	-.0164	1.1119916	10.7159
319	.9050	3.1539	.7500	.041	-.0121	-.0121	1.1273742	10.6127
320	1.0908	2.8163	.7500	.046	-.0172	-.0172	1.0666700	9.8047

## APPENDIX 2

	TIME	W/P	GPS	KE	P0	P1	P2	P3	EPS1	EPS2	EPS3	OP51	OP52	OP53	#SM 1	#SM 2	#SM 3	5 I 1	5 I 2	5 I 3	#R1	#R2	#R3
2	09	055	1457	14.67	14.67	17.23	16.72	2.15	2.09	2.21	1.34	1.41	1.49	103.0	107.6	107.6	56.1	58.4	0.0	-110	-110	-110	
3	09	054	1434	14.31	14.31	15.21	14.70	2.16	2.13	2.25	1.34	1.41	1.49	103.4	103.8	103.8	56.1	58.4	0.0	-110	-110	-110	
4	09	053	1411	14.15	14.15	15.05	14.54	2.17	2.14	2.26	1.34	1.41	1.49	103.8	104.2	104.2	56.1	58.4	0.0	-110	-110	-110	
5	09	052	1388	13.89	13.89	14.79	14.28	2.18	2.15	2.27	1.34	1.41	1.49	104.2	104.6	104.6	56.1	58.4	0.0	-110	-110	-110	
6	09	051	1365	13.73	13.73	14.63	14.12	2.19	2.16	2.28	1.34	1.41	1.49	104.6	105.0	105.0	56.1	58.4	0.0	-110	-110	-110	
7	09	050	1342	13.57	13.57	14.47	13.96	2.20	2.17	2.29	1.34	1.41	1.49	105.0	105.4	105.4	56.1	58.4	0.0	-110	-110	-110	
8	09	049	1319	13.41	13.41	14.31	13.80	2.21	2.18	2.30	1.34	1.41	1.49	105.4	105.8	105.8	56.1	58.4	0.0	-110	-110	-110	
9	09	048	1296	13.25	13.25	14.15	13.64	2.22	2.19	2.31	1.34	1.41	1.49	105.8	106.2	106.2	56.1	58.4	0.0	-110	-110	-110	
10	09	047	1273	13.09	13.09	13.99	13.48	2.23	2.20	2.32	1.34	1.41	1.49	106.2	106.6	106.6	56.1	58.4	0.0	-110	-110	-110	
11	09	046	1250	12.93	12.93	13.83	13.32	2.24	2.21	2.33	1.34	1.41	1.49	106.6	107.0	107.0	56.1	58.4	0.0	-110	-110	-110	
12	09	045	1227	12.77	12.77	13.67	13.16	2.25	2.22	2.34	1.34	1.41	1.49	107.0	107.4	107.4	56.1	58.4	0.0	-110	-110	-110	
13	09	044	1204	12.61	12.61	13.51	13.00	2.26	2.23	2.35	1.34	1.41	1.49	107.4	107.8	107.8	56.1	58.4	0.0	-110	-110	-110	
14	09	043	1181	12.45	12.45	13.35	12.84	2.27	2.24	2.36	1.34	1.41	1.49	107.8	108.2	108.2	56.1	58.4	0.0	-110	-110	-110	
15	09	042	1158	12.29	12.29	13.19	12.68	2.28	2.25	2.37	1.34	1.41	1.49	108.2	108.6	108.6	56.1	58.4	0.0	-110	-110	-110	
16	09	041	1135	12.13	12.13	13.03	12.52	2.29	2.26	2.38	1.34	1.41	1.49	108.6	109.0	109.0	56.1	58.4	0.0	-110	-110	-110	
17	09	040	1112	11.97	11.97	12.87	12.36	2.30	2.27	2.39	1.34	1.41	1.49	109.0	109.4	109.4	56.1	58.4	0.0	-110	-110	-110	
18	09	039	1089	11.81	11.81	12.71	12.20	2.31	2.28	2.40	1.34	1.41	1.49	109.4	109.8	109.8	56.1	58.4	0.0	-110	-110	-110	
19	09	038	1066	11.65	11.65	12.55	12.04	2.32	2.29	2.41	1.34	1.41	1.49	109.8	110.2	110.2	56.1	58.4	0.0	-110	-110	-110	
20	09	037	1043	11.49	11.49	12.39	11.88	2.33	2.30	2.42	1.34	1.41	1.49	110.2	110.6	110.6	56.1	58.4	0.0	-110	-110	-110	
21	09	036	1020	11.33	11.33	12.23	11.72	2.34	2.31	2.43	1.34	1.41	1.49	110.6	111.0	111.0	56.1	58.4	0.0	-110	-110	-110	
22	09	035	997	11.17	11.17	12.07	11.56	2.35	2.32	2.44	1.34	1.41	1.49	111.0	111.4	111.4	56.1	58.4	0.0	-110	-110	-110	
23	09	034	974	11.01	11.01	11.91	11.40	2.36	2.33	2.45	1.34	1.41	1.49	111.4	111.8	111.8	56.1	58.4	0.0	-110	-110	-110	
24	09	033	951	10.85	10.85	11.75	11.24	2.37	2.34	2.46	1.34	1.41	1.49	111.8	112.2	112.2	56.1	58.4	0.0	-110	-110	-110	
25	09	032	928	10.69	10.69	11.59	11.08	2.38	2.35	2.47	1.34	1.41	1.49	112.2	112.6	112.6	56.1	58.4	0.0	-110	-110	-110	
26	09	031	905	10.53	10.53	11.43	10.92	2.39	2.36	2.48	1.34	1.41	1.49	112.6	113.0	113.0	56.1	58.4	0.0	-110	-110	-110	
27	09	030	882	10.37	10.37	11.27	10.76	2.40	2.37	2.49	1.34	1.41	1.49	113.0	113.4	113.4	56.1	58.4	0.0	-110	-110	-110	
28	09	029	859	10.21	10.21	11.11	10.60	2.41	2.38	2.50	1.34	1.41	1.49	113.4	113.8	113.8	56.1	58.4	0.0	-110	-110	-110	
29	09	028	836	10.05	10.05	10.95	10.44	2.42	2.39	2.51	1.34	1.41	1.49	113.8	114.2	114.2	56.1	58.4	0.0	-110	-110	-110	
30	09	027	813	9.89	9.89	10.79	10.28	2.43	2.40	2.52	1.34	1.41	1.49	114.2	114.6	114.6	56.1	58.4	0.0	-110	-110	-110	
31	09	026	790	9.73	9.73	10.63	10.12	2.44	2.41	2.53	1.34	1.41	1.49	114.6	115.0	115.0	56.1	58.4	0.0	-110	-110	-110	
32	09	025	767	9.57	9.57	10.47	9.96	2.45	2.42	2.54	1.34	1.41	1.49	115.0	115.4	115.4	56.1	58.4	0.0	-110	-110	-110	
33	09	024	744	9.41	9.41	10.31	9.80	2.46	2.43	2.55	1.34	1.41	1.49	115.4	115.8	115.8	56.1	58.4	0.0	-110	-110	-110	
34	09	023	721	9.25	9.25	10.15	9.64	2.47	2.44	2.56	1.34	1.41	1.49	115.8	116.2	116.2	56.1	58.4	0.0	-110	-110	-110	
35	09	022	698	9.09	9.09	9.99	9.48	2.48	2.45	2.57	1.34	1.41	1.49	116.2	116.6	116.6	56.1	58.4	0.0	-110	-110	-110	
36	09	021	675	8.93	8.93	9.83	9.32	2.49	2.46	2.58	1.34	1.41	1.49	116.6	117.0	117.0	56.1	58.4	0.0	-110	-110	-110	
37	09	020	652	8.77	8.77	9.67	9.16	2.50	2.47	2.59	1.34	1.41	1.49	117.0	117.4	117.4	56.1	58.4	0.0	-110	-110	-110	
38	09	019	629	8.61	8.61	9.51	9.00	2.51	2.48	2.60	1.34	1.41	1.49	117.4	117.8	117.8	56.1	58.4	0.0	-110	-110	-110	
39	09	018	606	8.45	8.45	9.35	8.84	2.52	2.49	2.61	1.34	1.41	1.49	117.8	118.2	118.2	56.1	58.4	0.0	-110	-110	-110	
40	09	017	583	8.29	8.29	9.19	8.68	2.53	2.50	2.62	1.34	1.41	1.49	118.2	118.6	118.6	56.1	58.4	0.0	-110	-110	-110	
41	09	016	560	8.13	8.13	9.03	8.52	2.54	2.51	2.63	1.34	1.41	1.49	118.6	119.0	119.0	56.1	58.4	0.0	-110	-110	-110	
42	09	015	537	7.97	7.97	8.87	8.36	2.55	2.52	2.64	1.34	1.41	1.49	119.0	119.4	119.4	56.1	58.4	0.0	-110	-110	-110	
43	09	014	514	7.81	7.81	8.71	8.20	2.56	2.53	2.65	1.34	1.41	1.49	119.4	119.8	119.8	56.1	58.4	0.0	-110	-110	-110	
44	09	013	491	7.65	7.65	8.55	8.04	2.57	2.54	2.66	1.34	1.41	1.49	119.8	120.2	120.2	56.1	58.4	0.0	-110	-110	-110	
45	09	012	468	7.49	7.49	8.39	7.88	2.58	2.55	2.67	1.34	1.41	1.49	120.2	120.6	120.6	56.1	58.4	0.0	-110	-110	-110	
46	09	011	445	7.33	7.33	8.23	7.72	2.59	2.56	2.68	1.34	1.41	1.49	120.6	121.0	121.0	56.1	58.4	0.0	-110	-110	-110	
47	09	010	422	7.17	7.17	8.07	7.56	2.60	2.57	2.69	1.34	1.41	1.49	121.0	121.4	121.4	56.1	58.4	0.0	-110	-110	-110	
48	09	009	399	7.01	7.01	7.91	7.40	2.61	2.58	2.70	1.34	1.41	1.49	121.4	121.8	121.8	56.1	58.4	0.0	-110	-110	-110	
49	09	008	376	6.85	6.85	7.75	7.24	2.62	2.59	2.71	1.34	1.41	1.49	121.8	122.2	122.2	56.1	58.4	0.0	-110	-110	-110	
50	09	007	353	6.69	6.69	7.59	7.08	2.63	2.60	2.72	1.34	1.41	1.49	122.2	122.6	122.6	56.1	58.4	0.0	-110	-110	-110	
51	09	006	330	6.53	6.53	7.43	6.92	2.64	2.61	2.73	1.34	1.41	1.49	122.6	123.0	123.0	56.1	58.4	0.0	-110	-110	-110	
52	09	005	307	6.37	6.37	7.27	6.76	2.65	2.62	2.74	1.34	1.41	1.49	123.0	123.4	123.4	56.1	58.4	0.0	-110	-110	-110	
53	09	004	284	6.21	6.21	7.11	6.60	2.66	2.63	2.75	1.34	1.41	1.49	123.4	123.8	123.8	56.1	58.4	0.0	-110	-110	-110	
54	09	003	261	6.05	6.05	6.95	6.44	2.67	2.64	2.76	1.34	1.41	1.49	123.8	124.2	124.2	56.1	58.4	0.0	-110	-110	-110	
55	09	002	238	5.89	5.89	6.79	6.28	2.68	2.65	2.77	1.34	1.41	1.49	124.2	124.6	124.6	56.1	58.4	0.0	-110	-110	-110	
56	09	001	215	5.73	5.73	6.63	6.12	2.69	2.66	2.78	1.34	1.41	1.49	124.6	125.0	125.0	56.1	58.4	0.0	-110	-110	-110	
57	09	000	192	5.57	5.57	6.47	5.96	2.70	2.67	2.79	1.34	1.41	1.49	125.0	125.4	125.4	56.1	58.4	0.0	-110	-110	-110	
58	09	000	169	5.41	5.41	6.31	5.80	2.71	2.68	2.80	1.34	1.41	1.49	125.4	125.8	125.8	56.1	58.4	0.0	-110	-110	-110	
59	09	000	146	5.25	5.25	6.15	5.64	2.72	2.69	2.81	1.34	1.41	1.49	125.8	126.2	126.2	56.1	58.4	0.0	-110	-110	-110	
60	09	000	123	5.09	5.09	5.99	5.48	2.73	2.70	2.82	1.34	1.41	1.49	126.2	126.6	126.6	56.1	58.4	0.0	-110	-110	-110	
61	09	000	100	4.93																			

187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700
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